

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

November 18, 2020

Kevin Kutcel Spraying Systems Company 16815 Southpark Drive Westfield, IN 46074

Subject: PRIA Label Amendment – Addition of Emerging Viral Pathogens Claims

Product Name: Pathonex

EPA Registration Number: 88161-1 Application Date: 07/09/2020 Decision Number: 564558

Dear Mr. Kutcel:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Because you have opted to add statements pertaining to emerging viral pathogens to your label as described in the August 19, 2016, Guidance to Registrants: Process For Making Claims Against Emerging Viral Pathogens Not On EPA-Registered Disinfectant Labels ("Guidance"), https://www.epa.gov/sites/production/files/2016-09/documents/emerging_viral_pathogen_program_guidance_final_8_19_16_001_0.pdf, you are subject to the following additional terms of registration:

- 1. You may make statements pertaining to emerging viral pathogens only through the following communications outlets: technical literature distributed exclusively to health care facilities, physicians, nurses and public health officials, "1-800" consumer information services, social media sites and company websites (non-label related). These statements shall not appear on marketed (final print) product labels.
- 2. Your statements pertaining to emerging viral pathogens must adhere to the format approved on the Agency-accepted master label.

- 3. You may make statements pertaining to emerging viral pathogens only upon a disease outbreak that meets all the following criteria:
 - a. The causative organism must be a virus that causes an infectious disease that has appeared in a human or animal population in the U.S. for the first time, or that may have existed previously but is rapidly increasing in incidence or geographic range.
 - i. For human disease, the outbreak is listed in one of the following Centers for Disease Control (CDC) publications:
 - A. CDC Current Outbreak List for "U.S. Based Outbreaks" (www.cdc.gov/outbreaks),
 - B. CDC Current Outbreak List for "Outbreaks Affecting International Travelers" with an "Alert" or "Advisory" classification (www.cdc.gov/outbreaks) (also released through the CDC's Health Alert Network (HAN) notification process)
 - C. Healthcare-Associated Infections (HAIs) Outbreaks and Patient Notifications page (www.cdc.gov/hai/outbreaks)
 - ii. For animal disease, the outbreak is identified as an infectious disease outbreak in animals within the U.S. on the World Organization for Animal Health (OIE) Weekly Disease Information page (www.oie.int/wahis 2/public/wahid.php/Diseaseinformation/WI).
 - A. The CDC or OIE has identified the taxonomy, including the viral family and/or species, of the pathogen and provides notice to the public of the identity of the emerging virus that is responsible for an infectious disease outbreak. Based on the taxonomy of the outbreak pathogen identified by the CDC or OEI, the pathogen's viral subgroup is small non-enveloped, large non-enveloped, and enveloped.
 - B. The virus can be transmitted via environmental surfaces (non-vector transmission), and environmental surface disinfection has been recommended by the CDC, OIE or EPA to control the spread of the pathogen.
- 4. You may begin communicating statements pertaining to emerging viral pathogens only upon CDC or OIE's publication per term 3.a. of an outbreak of an emerging viral pathogen meeting all of the criteria of term 3. You must cease and remove all such non-label communications intended for consumers no later than 24 months after the original publication of the outbreak per term 3.a., unless the Agency issue written guidance to the contrary due to continued public health concerns. The emerging pathogen claim language may remain on the master label.
- 5. Terms from points 1 through 4 above shall become immediately void and ineffective if registration for use against Poliovirus type 1, ATCC VR-1562 and/or Feline Calicivirus as a surrogate for Norovirus is suspended or cancelled or no longer meets the criteria for

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a disinfectant claim (see EPA Product Performance Test Guideline 810.2200). In addition, terms B.1 through B.4 above shall become immediately void and ineffective upon your receipt of evidence of ineffectiveness against any pathogen in a less-resistant Spaulding category.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Assurance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Jake McFarley by phone at (703) 347-0123, or via email at McFarley.Jake@epa.gov.

Sincerely,

Demson Fuller, Product Manager 32 Regulatory Management Branch I Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure: Master Label

ACCEPTED

11/18/2020

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2010 1

88161-1

Pathonex

Hypochlorous Acid Solution

Hospital Broad-Spectrum Disinfectant, Viricide and Food Contact Surface Sanitizer

Pathonex has efficacy against [any target pathogen listed] in [respective contact time] on [any use site] (and/or) [any use surface]. Effective against odor-causing bacteria on [any use site] (and/or) [any use surface].

| Active Ingredient: Hypochlorous Acid00.018 | 1% |
|--|----------------|
| Other Ingredients:99.9819 |) % |
| Total100.000 |)% |

Contains 180 ppm Free Available Chlorine (FAC)

Keep Out of Reach of Children

Product must be used within 30 days of production

| Use by: | | |
|-------------|--|--|
| Lot Number: | | |

Manufactured by: Spraying Systems Co. 100 W. Lake Dr. Glendale Heights, IL 60139

Net Contents: [As Specified in X gal, X oz, X L, or X mL (X is a placeholder for 1-300)]

[Note to reviewer: net Contents to be displayed on the front page of the label]

[Sample Product Tracking Labeling]



Directions for Use [Sanitization]

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

To Sanitize [and Deodorize] Hard, Non-Porous Food Contact Surfaces:

- 1. Remove visible soil. Thoroughly pre-clean surface with [PathoClean®], [Klarion® Cleaner], [or other] cleaning solution prior to disinfection.
- 2. Apply [spray, wipe or soak] Pathonex with cloth, sponge or sprayer onto the precleaned surface until thoroughly wet.
- 3. Allow surfaces to remain visibly wet for a contact time of one (1) minute.
- 4. [If desired] air dry or wipe dry. Must rinse or wipe dry on metal surfaces.

To Sanitize [and Deodorize] Conveyors, Peelers, Slicers and Saws for Food Processing:

- 1. Remove visible soil by spraying or wiping all surfaces of equipment with water.
- 2. Thoroughly pre-clean surface with [PathoClean®], [Klarion® Cleaner], [or other] cleaning solution prior to disinfection.
- 3. Apply [spray, wipe or soak] Pathonex with cloth, sponge or sprayer onto the precleaned surface until thoroughly wet.
- 4. Allow surfaces to remain visibly wet for a contact time of one (1) minute.
- 5. [If desired] air dry or wipe dry. Must rinse or wipe dry on metal surfaces.

To Sanitize [and Deodorize] Holding Tanks:

- 1. Remove visible soil by spraying fresh water, preferably with a tank cleaning device, until all surfaces have been covered.
- 2. Thoroughly pre-clean surface with [PathoClean®], [Klarion® Cleaner], [or other] cleaning solution prior to disinfection preferably through a tank cleaning device.
- 3. Apply Pathonex to all surfaces, preferably with a tank cleaning device, until all surfaces have remained visibly wet for a contact time of one (1) minute.
- 4. Must rinse with fresh water, preferably with a tank cleaning device, for any metal tanks.

To Sanitize [and Deodorize] Process and Plumbing Lines:

- 1. Clear the line of visible soil and flush out any visible soil with fresh water.
- 2. Continuously flush [PathoClean], [Klarion Cleaner], [or other] cleaning solution through process or plumbing lines until surfaces are clean.
- 3. Continuously flush Pathonex through process or plumbing lines until all surfaces have remained visibly wet for a one (1) minute contact time.
- 4. Continuously flush lines with fresh water until all Pathonex has been purged from the process or plumbing lines.

Directions for Use [Disinfection]

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

To Disinfect [and Deodorize] Hard, Non-Porous Surfaces:

- 1. Remove visible soil and thoroughly pre-clean surface with [PathoClean®], [Klarion® Cleaner], [or other] cleaning solution prior to disinfection.
- 2. Apply [spray, wipe or soak] Pathonex with cloth, sponge or sprayer onto the precleaned surface until thoroughly wet.
- 3. Allow surfaces to remain visibly wet for a contact time of ten (10) minutes.
- 4. [If desired] air dry or wipe dry. Must rinse or wipe dry on metal surfaces.

To Disinfect [and Deodorize] Non-Critical Medical Equipment and Surfaces:

- 1. Thoroughly pre-clean surfaces with [PathoClean], [Klarion Cleaner], [or other] cleaning solution prior to disinfection.
- 2. Apply [spray, wipe or soak] Pathonex directly to pre-cleaned surfaces. Thoroughly wet the area to be disinfected.
- 3. Allow surfaces to remain visibly wet for a contact time of ten (10) minutes.
- 4. [If desired] wipe surface dry using a clean disposable cloth [and/or towel]. Discard cloth [and/or towel].

The product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Pathonex has been tested and found to be effective against the following microorganisms on a pre-cleaned, hard, non-porous surface.

| Target pathogens for food contact surface sanitization | Strain | Contact Time |
|--|-----------|--------------|
| Salmonella Enterica | ATCC 6539 | 1 minute |
| Staphylococcus Aureus | ATCC 6538 | |

| Target pathogens for disinfection | Strain | Contact Time |
|--|--------------|---------------------|
| Poliovirus type 1 | ATCC VR-1562 | |
| Feline Calicivirus (Norovirus surrogate) | ATCC VR-782 | |
| Salmonella enterica | ATCC 10708 | 10 minutes |
| Staphylococcus aureus | ATCC 15442 | |
| Pseudomonas aeruginosa | ATCC 6538 | |

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a closed plastic container in a cool, dry location away from heat and sunlight. Do not shake. Do not store near easily oxidizable materials, acids and reducers. In case of spill, isolate container (if possible) and flood area with water to dissolve all material before disposing this container in trash.

Emergency Handling: In case of contamination or decomposition, do not reseal container. Isolate in open, well-ventilated area. Flood with large amounts of water. Cool unopened containers in vicinity by water spray.

Pesticide Disposal: Pesticide wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Improper disposal of excess pesticide, spray mixture or rinsate is violation of Federal law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the U.S. EPA Regional Office for guidance.

Container Handling: Refillable container. Refill this container with Pathonex only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the person refilling this container. To clean the container before final disposal, empty the remaining contents into application equipment or a mix tank. Fill container about 10 percent full of water. Agitate vigorously or recirculate water with pump for two (2) minutes. Dispose of rinsate as pesticide waste. Repeat the rinsing procedure two (2) more times. Then offer for recycling if available or puncture and dispose of in sanitary landfill, or by incineration, or by procedures allowed by state and local authorities.

Physical or Chemical Hazards

Pathonex is not compatible with other chemicals such as acids, ammonia and hydrogen peroxide. DO NOT MIX WITH OTHER CHEMICALS. Pathonex is an electrolytic activated aqueous solution produced by separating the ions of a brine solution through selectively permeable membranes changing the properties of the water into a powerful oxidizing agent exhibiting antimicrobial properties. Pathonex is produced at a near 5.5 pH where the predominant antimicrobial agent is hypochlorous acid, an efficient and efficacious species of chlorine. Hypochlorous acid kills bacteria according to label directions. Pathonex can be applied as a liquid or spray. Pathonex freezes at 32° F and boils at 212° F. Pathonex is a colorless, aqueous solution, with a slight chlorine or ozone odor. After production, Pathonex must be stored in a closed, plastic container in a cool, dark area away from direct sunlight. The Pathonex product must be used within 30 days of production.

Additional Use Sites:

- + Business[es]
- + Bar[s]
- + Cafeteria[s]
- + Coffee shop[s]
- + Commercial building[s]
- + Convenience store[s]
- + Facility [facilities]
- + Food processing facility [facilities]
- + Produce area[s]
- + Seafood warehousing and/or fishery [fisheries]
- + Food service facility [facilities]
- + Food serving area[s]
- + Food cart[s] and/or food truck[s]
- + Fast food restaurant[s]
- + Shop[s]
- + Restaurant[s], bar[s]
- + Beverage shop[s] and brewery [breweries]
- + Delicatessen[s]
- + Supermarket[s]
- + Grocery store[s]
- + Cooperative market[s] and/or Co-op[s]
- + Mini-mart[s]
- + Convenience mart[s]
- + Liquor store[s]
- + Warehouse club[s]
- + Institution[al] facility [facilities]
- + Food preparation area[s]
- + Catering facility [facilities]
- + [Commercial][institutional] kitchen[s] and/or kitchenette[s]
- + Commissary [Commissaries]
- + Banquet hall[s]
- + Dining area[s]
- + Hotel[s]
- + Motel[s]
- + Resort[s]
- + Hostel[s]
- + Bed and breakfast[s]
- + Casino[s]
- + Hospitality area[s]
- + Condominium[s]
- + Vacation home[s]
- + Apartment[s]
- + Dormitory (Dorm) [dormitories]

- + Lodging establishment[s]
- + Household[s]
- + Home[s]
- + Mobile home[s]
- + Motor home[s]
- + Camper[s]
- + [General] facility [facilities]
- + Reception area[s]
- + Office[s] building[s]
- + Trans-warehousing
- + Warehouse[s]
- + Distribution center[s]
- + Shipping facility [facilities]
- + School[s]
- + Pre-school[s]
- + Elementary school[s]
- + Middle school[s]
- + High school[s]
- + Preparatory school[s]
- + Alternative school[s]
- + College[s]
- + Vocational school[s]
- + University [universities]
- + Arena[s] and/or sports stadium[s]
- + Athletic facility [facilities]
- + Workout facility [facilities]
- + Fitness center[s]
- + Health club[s]
- + Gymnasium[s]
- + Locker room[s]
- + Recreation[al] center[s]
- + Bowling alley[s]
- + Gaming facility [facilities]
- + Public recreation[al] facility [facilities]
- + Amusement park[s] and/or theme park[s]
- + Movie theatre[s]
- + Bowling alley[s]
- + Indoor playground[s]
- + Club[s]
- + [Exterior] surfaces of fountain[s]
- + Convocation center[s]
- + Airport[s]
- + Church [facility] [facilities]
 - Food pantry [pantries]

Additional Use Sites (continued):

- + Charitable establishment[s]
- + Government facility [facilities]
- + Public venue[es]
- + Police station[s]
- + Fire station[s]
- + Post office[s]
- + Library [libraries]
- + Customs facility [facilities]
- + Immigration[s] facility [facilities]
- + Military installation[s] and/or accommodation[s] and/or barrack[s]
- + Correctional facility [facilities]
- + Prison[s]
- + Childcare center[s]
- + Day-care center[s]
- + Mall[s]
- + Shopping center[s]
- + Retail outlet[s]
- + Wholesale outlet[s]
- + Mass merchandiser[s]
- + Discount retailer[s]
- + General merchandise store[s]
- + Pet store[s]
- + Laboratory [laboratories]
- + Cruise ship[s] and/or ship[s] and/or boat[s] and/or yacht[s]
- + Shipyard[s]
- + Airplane[s] and/or airport[s]
- + Train[s]
- + Transportation terminal[s] and/or transportation equipment and/or transportation vehicle[s]

- + Subway[s] and/or subway car[s]
- + Trolley[s] and/or tram[s] and/or streetcar[s]
- + Truck[s]
- + Bus[es]
- + Taxi[s]
- + Limo[s]
- + Vehicle[s] and/or automobile[s]
- + Emergency vehicle[s]
- + Transport container[s]
- + [Parcel] transport vehicle[s] and/or semitrailer[s]
- + Park[s] and/or park facility [facilities]
- + Truck stop[s]
- + Rest area[s]
- + Shelter[s]
- + Playground[s]
- + Trailer[s] and/or camper[s]
- + Flower shop[s] and/or florist[s]
- + Humane shelter[s] or animal shelter[s]
- + Pet care facility [facilities] or grooming facility [facilities] or kennel[s]
- + Veterinary facility [facilities]
- + Zoo[s] and/or animal sanctuary [sanctuaries]
- + [Animal] transport[ation] vehicle[s]
- + Storage facility [facilities] and/or storage area[s]
- Long-term care facility [facilities] and/or rehabilitation facility [facilities] and/or therapy facility [facilities]
- + Recycling center[s]
- + Healthcare facility [facilities] and/or hospital[s]

Hard Nonporous Use Surfaces:

- + Animal equipment and/or animal cage[s] and/or feed rack[s]
- + Appliance exterior surface[s]
- + Booster seat[s]
- + Cabinet[s]
- + Casino machine[s]
- + Cellular phone[s]
- + Chiller[s]
- + Computer keyboard[s]
- + Computer monitor[s]
- + Counter[s] and/or countertop[s]
- + Crib[s]
- + Desk[s]
- + Dish[es]
- + Dish rack[s]
- + Door[s]
- + Doorknob[s]
- + Drain board[s]
- + Faucet[s]
- + Fixture[s]
- + Floor[s]
- + Food cart[s] and/or food truck[s]
- + Food case[s] [exterior]
- + Food tray[s]
- + Freezer surface[s]*
- + Furniture (test on inconspicuous spot first)
- + Game machine[s]
- + Garbage can[s] and/or trash can[s]
- + Glass and/or mirror[s]
- + Grocery [store] cart[s] and/or supermarket cart[s]
- + Hamper[s]
- + Hand [soap] dispenser[s]

- + Handrail[s]
- + Hard [non-porous] surface[s]
- + Headset[s]
- + Highchair[s]
- + High touch surface[s] [points]
- + Hood[s]
- + Microwave surface[s]
- + Oven surface[s]
- + Other telecommunication equipment
- + Play table[s] and/or station[s]
- + Pot[s] and/or pan[s] and/or ware
- + Reception counters and/or area[s]
- + Refrigerator surface[s]*
- + Shelve[s] and/or shelving
- + Sink[s]
- + Table[s]
- + Telephone[s]
- + Sealed tile and/or grout
- + Towel dispenser[s]
- + Toy[s]
- + Salad bar splash and/or sneeze guard[s]
- + Storage container[s]
- + Utensil[s]
- + Vanity [vanities] and/or vanity top[s]
- + Ware washer[s] and/or ware wash machine[s] and/or dishwasher[s] and/or dish machine[s]
- + [Wash] basin[s]
- + [Washable] chair[s]
- + [Washable] wall[s]
- + [Water] [drinking] fountain[s]
- + Wheelchair[s]
- + Window[s] and/or glass and/or mirror[s]

^{*} surfaces must come to room temperature for treatment

Surface Materials:

- + ABS [Acrylonitrile butadiene styrene] [plastic]
- + Aluminum
- + Baked enamel
- + [Brushed] [polished] nickel
- + [Brushed] bronze
- + Chrome
- + Common hard, non-porous household [environmental surfaces]
- + Formica
- + Glass
- + Glazed ceramic tile
- + Glazed porcelain
- + Glazed porcelain enamel
- + Sealed granite
- + [Hard,] [non-porous] surface[s] or environmental surface[s]
- + Laminated surface[s]

- + Sealed limestone
- + Linoleum
- + Sealed Marble
- + Melamine
- + Mirror
- + Painted surface[s]
- + Plastic laminate[s]
- + [Polished] chrome
- + Polyacrylic
- + Polycarbonate
- + Polyethylene
- + Sealed slate
- + Stainless steel
- + Sealed stone surface[s]
- + Synthetic marble
- + Sealed terrazzo
- + Vinyl tile

Emerging Viral Pathogen Claims

[Note to Reviewer: None of the language in this section is to appear on any final printed label]

This product qualifies for emerging viral pathogen claims per the EPA's "Guidance to Registrants: Process for Making Claims Against Emerging Viral Pathogens not on EPA-Registered Disinfectant Labels" when used in accordance with the appropriate use directions indicated below.

This product meets the criteria to make claims against certain emerging viral pathogens from the following viral categories when used in accordance with the directions for use for the following organisms on the label:

| For an emerging viral pathogen that is a/an | follow the directions for use for the following organisms on the label: |
|---|---|
| Enveloped virus | One of the following: Poliovirus type 1, ATCC VR-1562, Strain Chat |
| Large Non-enveloped | One of the following: Poliovirus type 1, ATCC VR-1562, Strain Chat |
| Small, non-enveloped virus | Two of the following: Poliovirus type 1, ATCC VR-1562, Strain Chat Feline Calicivirus as a surrogate for Norovirus |

Table revision made: 10/08/2020

The following statements may be used only in non-label communications as described in EPA's Emerging Viral Pathogens guidance, and only under the conditions outlined in that guidance:

- Pathonex has demonstrated effectiveness against viruses similar to [emerging viral pathogen] on hard, non-porous surfaces. Therefore, Pathonex can be used against [emerging viral pathogen] when used in accordance with the directions for use against [name of supporting virus(es)] on precleaned, hard, non-porous surfaces. Refer to the [CDC or OIE] website at [pathogen-specific website address] for additional information.
- [Name of illness/outbreak] is caused by [name of emerging virus]. Pathonex kills similar viruses and therefore can be used against [name of emerging virus] when used in accordance with the directions for use against Poliovirus Type 1 and Norovirus on hard, non-porous surfaces. Refer to the [CDC or OIE] website at [website address] for additional information.

Optional Marketing Language/Additional Claims:

- + Produced by the electrolysis of salt [NaCl] and water [H2O]
- + Electrochemically activated solution [ECAS]
- + [This product is an] electrolytically generated sanitizer/disinfectant
- + Brine does not enter [the] [electrolytic] cell
- + No salt residue
- + [Patented] [technology where] salt [NaCl] does not enter the [electrolytic] cell and therefore [is] not added to [the] output solution[s]
- + [Generated using] [PathoSans®] patented [electrolytic] cell technology
- + [This product is] [generated using] [PathoSans] patented [electrolytic] cell technology keeps [or keeping] the brine separate[d] from the [product] output solution
- + pH is between 4.5 and 6 [which is the optimal range for [hypochlorous acid] stability]
- + Hypochlorous [acid] is a strong oxidizing agent with antimicrobial activity
- + [A] [dilute] hypochlorous acid solution
- + Freezing point: 32°F
- + Boiling point: 212°F
- + Ready-to-use and/or [no dilution required]
- + No mixing [necessary]
- + No complicated dilution process[es]
- + Drain [and disposal] friendly
- + [This product] rapidly breaks down after use
- + [This product is] not harmful to septic [and wastewater treatment] systems
- + Refillable container
- + Sanitizer [disinfectant]
- + Non-irritating [and/or non-corrosive] to eyes
- + Non-irritating [and/or non-corrosive] to skin
- + Non-irritating [and/or non-corrosive] to nose
- + No PPE [Personal Protective Equipment] required
- + Use without gloves
- + Gentle enough to (sanitize) (and/or) (disinfect) (homes) (nurseries) (playrooms)
- + A (gentle) (mild) way to sanitize (and/or disinfect)
- + Affordable
- + Easy to use
- + Convenient
- + Simple
- + Economical
- + Consistent
- + Highly effective

- + High performance
- + Proven to [sanitize and/or disinfect] at 180 ppm of [free active chlorine] [FAC]
- + Pathonex is a clear liquid with a slight chorine smell
- + Acute toxicity category IV classification
- + Can be stored up to 30 days and still sanitize {and/or disinfect]
- + [Can] reduce the risk of cross-contamination between treated surfaces
- + Antibacterial [action]
- + Bactericide or Bactericidal
- + Biocide or Biocidal
- + Inactivates viruses***
- + [Pathonex] Kills germs* [in the (insert use site)]
- + Sanitizes (kills) (eliminates) (destroys) (removes) 99.9% of (bacteria) (germs*) [insert any target pathogen listed] in your [insert any use site listed]
- + Disinfects (kills) (eliminates) (destroys) (removes) 99.9% of (bacteria) (germs*) [insert any target pathogen listed] in your [insert any use site listed]
- + Cost effective [food contact] [surface] sanitizer [and] [disinfectant]
- + Sanitize[s] surfaces in food preparation [prep] areas
- + Sanitize[s] surfaces [in areas] where food may go
- + Tested according to AOAC test methods for [food-contact surface] sanitizer [and/or] [hospital disinfectant]
- + Easily sanitize[s] [and/or] [disinfect[s]]
- + Sanitizes surfaces or sanitizes [surfaces]
- + Disinfect surfaces or disinfects [surfaces]
- + Leaves surfaces sanitized [or disinfected]
- + Daily sanitizing of food-contact surfaces
- + Sanitize[s] [and/or] [disinfect] glass [and/or mirror]
- + Food surface [contact] sanitizer
- + [This product] leaves surfaces sanitized/disinfected
- + Disinfects hard, non-porous surfaces
- + Hospital disinfectant
- + Broad-spectrum disinfectant
- + 99.9% effective sanitation
- + 99.9% effective disinfection
- + Leaves [surfaces] sanitary [disinfected]
- + Deodorizes by killing common germs* [or bacteria**** (and/or) viruses***]
- + Removes or eliminates odors [at the source] [by killing bacteria**** (and/or) viruses***]
- + Eliminates [urine] odor
- + Eliminates odors [caused by bacteria]
- + Effective against odor causing bacteria

- + Removes odor causing bacteria, mold and mildew
- + No rinsing necessary
- + Removes or eliminates odors [at the source]
- + Will not leave grit or soap scum
- + Removes hard water buildup [or deposit]
- + (0%) (none) (No) (free from) (unnecessary ingredients) (ammonia) ((synthetic) (artificial) fragrance(s)) (fragrance) (dyes) (fragrance(s) and dye(s)) (rinse required) (parabens) (artificial coloring) (mineral oil) (triclosan) (Perchloroethylene) (hydrogen peroxide) (peroxide(s)) (peroxide bleach) (phosphates) (phosphates) (sodium hydroxide) (phthalates)
- + [This product] [Contains] no VOC [Volatile Organic Compounds]
- + [This product is] VOC [Volatile Organic Compounds] free
- + [This product] [Contains] no NPEs [Nonylphenol ethoxylates]; Nonylphenol ethoxylate [NPE] free
- + [This product is] Phosphate free; Phosphate free
- + [This product is] Ammonia free; Ammonia free
- + [This product is] Alcohol free; Alcohol free
- + [This product is] Phosphorous free; Phosphorous free
- + [This product] [contains] no phthalates; [This product is] phthalate free
- + [This product] [contains] no perchloroethylene; [This product is] perchloroethylene free
- + [This product] [contains] no triclosan; [This product is] triclosan free
- + [This product] [contains] no 2-butoxyethanol; [This product is] free of 2-butoxyethanol
- + [This product] [contains] no surfactants; [This product is] surfactant free
- + [This product] [contains] no chelating agents; [This product is] free of chelating-agents
- + [This product] [contains] no buffers; [This product is] free of buffers
- + [This product] [contains] no builders; [This product is] free of builders
- + [This product] [contains] no foaming agents; [This product is] free of foaming agents
- + [This product] [contains] no anti-foaming agents; [This product is] free of anti-foaming agents
- + [This product] [contains] no perfumes; [This product is] perfume free
- + [This product] [contains] no colorants [dyes]; [This product is] free of colorants [dyes]
- + [This product] [contains] no additives; [This product is] additive-free
- + For sanitizing [disinfecting] [insert one or more of the surfaces listed on the label]
- + For use on [insert one or more of the surfaces listed on the label]
- + For use in [insert one or more of use sites listed on label]
- + [Ideal] for use in kitchens [and public areas]
- + [For use on] high touch surfaces
- + For (daily) (everyday) use
- + For everyday disinfection

- + No harsh (chemical(s)) (residue) (left) (behind)
- + No need to rinse
- + No accidental whitening
- + No rinsing (necessary) (required)
- + Tough on germs*
- + Reduce cross-contamination of germs between treated surfaces
- + Reduce the cross contamination of bacteria on treated, hard, nonporous surfaces
- + Eliminates food odors like garlic and onion left behind on kitchen surfaces after cooking
- + Eliminates odors caused by bacteria on food (contact) (preparation) hard, non-porous surfaces
- + Removes 99.9% of (kitchen) bacteria
- + Disinfects commonly touched hard, non-porous surfaces that can be transfer points for bacteria (such as doorknobs, telephones, keyboards and light switches)
- + Kills 99.9% of bacteria that can cause foodborne illness (food poisoning) **
- + Kills 99.9% of household bacteria
- * Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa, Poliovirus type 1 and Feline Calicivirus (Norovirus surrogate)
- ** Staphylococcus aureus, Salmonella enterica
- *** Poliovirus type 1 and Feline Calicivirus (Norovirus surrogate)
- **** Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa

Optional Graphics



